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Mar 04, 2015	
CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY _____	DEPUTY

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
SHANNON HENDERSON,  
  
Defendant.

NO. CR15-5138-RBL  
  
INFORMATION

The United States Attorney charges that:

**COUNT 1**  
**(Wire Fraud)**

**A. The Scheme and Artifice to Defraud**

1. Beginning at a time unknown in 2009, and continuing until in or around March 2014, at Tacoma, within the Western District of Washington, and elsewhere, SHANNON HENDERSON devised and intended to devise a scheme and artifice to defraud and obtain money and property by means of materially false and fraudulent pretenses, representations, promises, and the concealment of material facts.

2. The essence of the scheme and artifice to defraud was for HENDERSON to obtain personal identification information about real people and to use the personal identification information from real people to create false, fictitious, and fraudulent federal individual income tax returns.

INFORMATION/HENDERSON - 1

UNITED STATES ATTORNEY  
700 STEWART STREET, STE. 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1       3.       It was further part of the scheme that HENDERSON would and did file  
2 false, fictitious and fraudulent federal income tax returns, by wire, and by mail from her  
3 home in Tacoma, Washington, through and over the internet.

4       4.       It was further part of the scheme that HENDERSON would and did receive  
5 tax refunds from the Internal Revenue Service, and that she would and did convert these  
6 refunds for her personal use and for the use of others, but not for the real people in whose  
7 names she had filed returns.

8           **B.       Manner and Means of the Scheme and Artifice to Defraud**

9       5.       It was part of the scheme and artifice to defraud that HENDERSON  
10 obtained stolen personal identification information on real people from another individual  
11 and that HENDERSON shared a portion of the proceeds of the fraudulent tax refunds  
12 with this individual as compensation for providing the identifying information of real  
13 people to HENDERSON. The information provided to HENDERSON was obtained  
14 from the payroll records of real people who worked in Washington State for ABM  
15 Janitorial Service.

16       6.       It was part of the scheme and artifice to defraud that while incarcerated at  
17 the Purdy Washington Women's Correctional Center from 2007 to 2009, HENDERSON  
18 became pen pals with various inmates across the county and obtained the names and  
19 identifying information of real people from these inmates in order to use these names to  
20 file false and fraudulent U.S. Individual Income Tax Returns. It was HENDERSON's  
21 idea to prepare the false and fraudulent Income Tax Returns and she used various inmates  
22 to obtain the names and identifying information of real people.

23       7.       HENDERSON had the false refunds loaded onto pre-paid debit cards and  
24 then she drained the refunds from the pre-paid debit cards. HENDERSON used a  
25 relative's address, the addresses of friends, and addresses provided by others as addresses  
26 for the false tax returns and also as addresses for the mailing of the pre-paid debit cards  
27 she acquired.  
28

8. It was part of the scheme and artifice to defraud that HENDERSON collected \$56,605 in funds under this scheme.

**C. Execution of the Scheme and Artifice to Defraud**

9. On or about the date set forth below, at Tacoma, within the Western District of Washington, and elsewhere, SHANNON HENDERSON, having devised the above-described scheme and artifice, for the purpose of executing this scheme and artifice, did knowingly transmit and cause to be transmitted by wire communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds, to wit:

Count	Date	Sender	Wire Transmission	Refund Claimed
1	2/10/13	Shannon Henderson	Electronic transmission of fraudulent tax return in the name of S.B. from the State of Washington to the IRS service center in the State of California	\$1,187.00

All in violation of Title 18, United State Code, Sections 1343.

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**COUNT 2**  
**(Aggravated Identity Theft)**


On or about February 10, 2013, at Tacoma, within the Western District of Washington, and elsewhere, SHANNON HENDERSON, knowingly and without lawful authority did transfer, possess, and use the means of identification of another person, specifically, the name of victim S.B., during and in relation to a felony listed in Title 18, United States Code, Section 1028A(c), that is, Wire Fraud, in violation of Title 18, United States Code, Section 1343, as charged in Count 1 above.

All in violation of Title 18, United States Code, Section 1028A.

Dated this 3<sup>rd</sup> day of March, 2015.

  
ANNETTE L. HAYES  
Acting United States Attorney

  
MICHAEL DION  
Assistant United States Attorney

  
REBECCA S. COHEN  
Assistant United States Attorney